UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

KIRA WAHLSTROM,

Plaintiff,

v.

C.A. NO. 1:22-cv-10792-RGS

DAVID J. HOEY, LAW OFFICES OF DAVID J. HOEY, P.C., DON C. KEENAN, D.C. KEENAN & ASSOCIATES, P.C. d/b/a THE KEENAN LAW FIRM, P.C., AND KEENAN'S KIDS FOUNDATION, INC.,

Defendants.

MOTION OF DEFENDANTS DON C. KEENAN AND D.C. KEENAN & ASSOCIATES, P.C. d/b/a THE KEENAN LAW FIRM, P.C. FOR SUMMARY JUDGMENT

Pursuant to Fed. R. Civ. P. 56, the Defendants Attorney Don Keenan and D.C. Keenan & Associates, P.C. d/b/a the Keenan Law Firm, P.C. (collectively "Keenan") move for summary judgment dismissing all counts and claims against them. In support of this Motion, Keenan states as follows:

- 1. There is no genuine dispute as to any fact material to this Motion; and
- 2. On the undisputed materials facts, Keenan is entitled to summary judgment as a matter of law.

For the foregoing reasons and the reasons given in the accompanying supporting memorandum, affidavit, and statement of undisputed material facts, this Motion should be granted and all counts and claims as against Keenan summarily dismissed.

DON C. KEENAN AND D.C. KEENAN & ASSOCIATES, P.C. d/b/a THE KEENAN LAW FIRM, P.C., By their Attorneys,

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LOCAL RULE 7.1 CERTIFICATION

I, John J. O'Connor, attest and certify that the parties conferred in compliance with Local Rule 7.1 prior to the filing of this Motion.

John J. O'Connor

CERTIFICATE OF SERVICE

I, John J. O'Connor, hereby certify that a copy of the foregoing document has

been served via ECF on this 14th day of August, 2023 to:

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